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JUSTIN AMES
OLENA TATURA
KAYLA CALLAHAN
HAKAN SEN

June 6, 2025

Via ECF

Honorable Margaret M. Garnett
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Clowreen Bobb v. Mulligan Security LLC*
Case No. 25-CV-18 (MMG)
Plaintiff's Consent Letter Motion to Amend Complaint

Dear Judge Garnett:

We represent Plaintiff Clowreen Bobb ("Bobb" or "Plaintiff") in the above-referenced matter. We write, with consent of Defendant's counsel, to respectfully request permission to file an Amended Complaint (Ex. A). On May 29, 2025, Plaintiff received a Right to Sue Letter from the EEOC. In the Proposed Amended Complaint, Plaintiff seeks to add a disability discrimination claim under the Americans with Disabilities Act of 1990 ("ADA"), in addition to the previously alleged disability discrimination claims under the NYSHRL and NYCHRL.

We thank Your Honor for her consideration of this request.

Respectfully submitted,

Akin & Salaman PLLC

/s/ Robert D. Salaman

Robert D. Salaman

cc: Kimberly K. Harding (counsel for Defendant)

GRANTED. Plaintiff may file an Amended Complaint by no later than **June 16, 2025**. Defendant's request to hold the Initial Pretrial Conference scheduled for June 26, 2025 remotely is also GRANTED. The conference will be held over Microsoft Teams. The public dial-in for the conference audio is: +1 646-453-4442,,697643346#. Counsel of record will receive a direct link to the conference via email. The Clerk of Court is respectfully directed to terminate Dkt. Nos. 10 and 11.

SO ORDERED. Dated June 9, 2025.


HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE